

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
Lynchburg Division**

WALTER SCOTT LAMB,	)	
	)	Case No. 6:21-cv-00055
Plaintiff/Counterclaim Defendant,	)	
v.	)	Hon. Norman K. Moon
	)	
LIBERTY UNIVERSITY, INC.,	)	
a Virginia corporation,	)	
	)	
Defendant/Counterclaim Plaintiff.	)	

**NOTICE**

Please note that the Plaintiff's Motion for Leave To File a Second Amended Complaint (ECF Doc. ¶ 71) is ripe for determination, in the opinion of the Plaintiff, having been fully briefed.

The Plaintiff waives any hearing, and his counsel has attempted to confer, in good faith, by email on May 5, 2022, to determine if the Defendant desires a hearing. The Defendant's counsel communicated on May 13, 2022, that it is preparing a motion concerning spoliation issues and "That potential spoliation issue has impact on the pending pleadings amendment motion, as good faith is a factor."

THOMAS H. ROBERTS & ASSOCIATES, P.C.  
By: /s/ Andrew T. Bodoh, Esq.  
Thomas H. Roberts, Esq. (VSB 26014)  
tom.roberts@robertslaw.org  
Andrew T. Bodoh, Esq. (VSB 80143)  
andrew.bodoh@robertslaw.org  
105 South 1st Street  
Richmond, Virginia 23219  
Tel: 804-783-2000  
Fax: 804-783-2105

Ian A. Northon, Esq.  
Michigan—P65082

Pennsylvania—207733  
Florida—101544  
Admitted Only Pro Hac Vice  
E. Meaghan Clayton  
Admitted Only Pro Hac Vice  
Michigan Bar No. P85409  
Rhoades McKee PC  
55 Campau Ave., N.W., Ste. 300  
Grand Rapids, MI 49503  
Telephone: (616) 233-5125  
ian@rhoadesmckee.com  
jjolliffe@rhoadesmckee.com  
mclayton@rhoadesmckee.com  
Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that on May 16, 2022, I electronically filed the foregoing document using the CM/ECF system, which will provide electronic notice and copies of such filing(s) to counsel of record.

THOMAS H. ROBERTS & ASSOCIATES, P.C.

By: /s/ Andrew T. Bodoh, Esq.

Thomas H. Roberts, Esq. (VSB 26014)

tom.roberts@robertslaw.org

Andrew T. Bodoh, Esq. (VSB 80143)

andrew.bodoh@robertslaw.org

105 South 1st Street

Richmond, Virginia 23219

Tel: 804-783-2000 / Fax: 804-783-2105

ATTORNEYS FOR PLAINTIFF